

FILED

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

AUG 15 2007

CLERK
U. S. DISTRICT COURT
MIDDLE DIST. OF ALA.

UNITED STATES OF AMERICA)

v.)

DONNIE ROY REEVES)

CR. NO. 1:07-CR-126-MHT

[18 U.S.C. § 1001(a)(2)

42 U.S.C. § 408(a)(4)]

SUPERCEDING INDICTMENT

The Grand Jury charges:

COUNT 1

1. On or about May 20, 2005, in the Middle District of Alabama and elsewhere, defendant,

DONNIE ROY REEVES,

did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the Social Security Administration, an agency within the executive branch of the United States, in that Reeves, in response to questions posed to him by a Social Security Administrator stated falsely that he had not been working, but wished he could work. In fact, as Reeves well knew, he had been working at various times since at least on or about April 5, 2000.

All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 2

2. Paragraph 1 is re-alleged in its entirety and incorporated by reference herein.
3. From on or about April 5, 2000 continuing until in or about November, 2006,

the defendant,

DONNIE ROY REEVES,

having knowledge of the occurrence of any event—that is, his obtaining and maintaining of employment, which affected his initial and continued right to Social Security Disability Insurance Benefits—did conceal and fail to disclose such event with an intent fraudulently to secure payment in a greater amount than was due and when no payment was authorized.

All in violation of Title 42, United States Code, Section 408(a)(4).

COUNT 3

4. Paragraphs 1-3 are re-alleged in their entirety and incorporated by reference herein.

5. On or about December 1, 2004, in the Middle District of Alabama and elsewhere, defendant,

DONNIE ROY REEVES,

did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the United States Department of Agriculture (“USDA”), an agency within the executive branch of the United States, in that Reeves, in completing a form for USDA rural housing assistance falsely under-represented his actual adjusted annual income and indicated that he only received Social Security income. In fact, as Reeves well knew, he earned additional income as an apartment manager.

All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 4

6. Paragraphs 1-5 are re-alleged in their entirety and incorporated by reference herein.

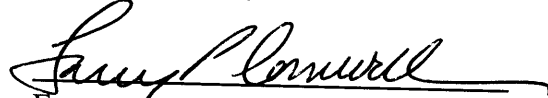
7. On or about November 23, 2005, in the Middle District of Alabama and elsewhere, defendant,


DONNIE ROY REEVES,


did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the United States Department of Agriculture ("USDA"), an agency within the executive branch of the United States, in that Reeves, in completing a form for USDA rural housing assistance falsely under-represented his actual adjusted annual income and indicated that he only received Social Security income. In fact, as Reeves well knew, he earned additional income as an apartment manager.

All in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:


Foreperson


LEURA G. CANARY
United States Attorney


CHRISTOPHER A. SNYDER
Assistant United States Attorney